

A & A PROPERTIES
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MARCH 12, 1990

DEAN FOWLER
COLBERT LANDFILL PROJECT MANAGER
N. 811 JEFFERSON
SPOKANE, WA. 99260

DEAR DEAN,

THIS IS TO FOLLOW UP ON OUR CONVERSATION OF MARCH 8, 1990 ABOUT THE SAMPLING AT COLBERT. ON THE 2ND OF MARCH I CONTACTED (b) (6) AND HE RELAYED TO ME THE SAME INFORMATION THAT BILL WEDLAKE HAD PREVIOUSLY STATED. WEDNESDAY THE 7TH I FINALLY WAS ABLE TO MEET WITH STEVE MAYER AND DISCUSS THE CONFLICT BETWEEN THE FIELD SHEET AND THE INFORMATION OF (b) (6) THE ENCLOSED INCIDENT REPORT SUMMARIZES MY FINDINGS.

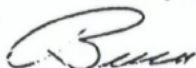
THE MARCH TESTING HAD ALREADY BEEN COMPLETED WHEN THIS INVESTIGATION BEGAN. I HAVE REQUESTED THAT 4 WELLS BE RESAMPLED AND TESTED USING PROPER SAMPLE TAKING AND PURGE VOLUME VALUES. THE WELLS ARE THOSE WITH KNOWN PURGE VOLUMES THAT ARE BETWEEN 150 - 400 GALLONS. THIS SHOULD GIVE SOME INDICATION OF THE PURGE VOLUME TO CONTAMINANT LEVEL CORRELATION WHICH THE PREVIOUS 4 MONTHS OF SAMPLING MAY HAVE TAINTED.

THE FIELD SHEET ARE BEING UPDATED TO INDICATE WELL CASING SIZE, WATER VOLUME IN WELL AND PRESSURE TANK SIZE. WHEN THIS INFORMATION IS KNOWN A PURGE VOLUME WILL BE GIVEN ON THE SHEET.

I BELIEVE THAT A LETTER SHOULD BE SENT TO THE WELL OWNERS THAT STATES WHO TO CONTACT IF THEY HAVE ANY COMMENTS ABOUT THE SAMPLING OF THEIR WELL AND ASK FOR AN OPINION ON THEIR EXPERIENCE WITH THE SAMPLERS TO DETERMINE THE EXTENT OF CONFIDENCE REBUILDING NECESSARY. THE PROCESS WOULD BE IN ADDITION TO THE DOOR HANGERS CURRENTLY BEING LEFT AT EACH SAMPLING.

I WILL LOOK FORWARD TO MEETING WITH YOU, MEL AND GRACE ON THURSDAY TO BRING THIS MATTER TO A CONCLUSION.

SINCERELY,



BRUCE G. AUSTIN

USEPA SF



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INCIDENT REPORT: (b) (6) WELL SAMPLING OCTOBER 7, 1989

THESE ARE THE FACTS AS I HAVE BEEN ABLE TO DETERMINE THEM FROM CONVERSATIONS WITH (b) (6) STEVE MAYER AND MEL WILSON.

ON OCTOBER 9, 1989 A SAMPLE WAS TAKEN FROM THE SPRINKLER MANIFOLD STRAINER BIB BY STEVE MAYER AND SCOTT RALPH. A SMALL QUANTITY OF WATER HAD REMAINED IN THE SYSTEM DURING THE BLOWING OUT PROCESS THAT (b) (6) HAD BEGUN ON THE FIRST OF OCTOBER. (b) (6) USES A COMPRESSOR TO EVACUATE THE LINES IN HIS OUTSIDE WATERING SYSTEM AND THIS WAS PHASED OVER A PERIOD OF A WEEK OR SO. A COMPRESSOR PART HAD FAILED THE DAY BEFORE AND (b) (6) WAS GETTING THE PART IN TOWN AT THE TIME THE SAMPLE WAS TAKEN.

STEVE MAYER TOOK THE SAMPLE WITH THE TEFLON TUBING USED ON ALL SAMPLING. SCOTT RALPH, A COLLEGE GRADUATE WHO WAS BEING TRAINED TO ASSIST STEVE, WAS DOING THE PAPERWORK AT THAT TIME. THE SAMPLE WAS TURNED INTO THE LAB ON THE 12TH BY RALPH AND RECEIPTED BY BILL BURKHARDT. THE PAPERWORK DID NOT REFLECT THE ACTUAL SAMPLING VOLUME NOR DID IT INDICATE THAT ANYTHING UNUSUAL HAD HAPPENED.

ON FEBRUARY 7TH WHEN THE (b) (6) WELL WAS SAMPLED, (b) (6) ASKED STEVE ABOUT THE OCTOBER SAMPLING. STEVE'S RESPONSE WAS THAT HE WAS ONLY ABLE TO GET A GALLON OR SO OUT OF THE SAMPLING POINT.

AFTER MEETING WITH DEAN FOWLER, BILL WEDLAKE, AND MEL WILSON ON FEB. 28TH, AND AGAIN WITH DEAN & BILL ON MARCH 2ND, I MET WITH (b) (6) HE REVIEWED ALL OF HIS DATA WITH ME TO CONFIRM THAT THE SPRINKLER MANIFOLD COULD NOT HAVE HAD MUCH, IF ANY WATER. ON MARCH 7TH I MET WITH STEVE MAYER AND REVIEWED THE CONVERSATION WITH (b) (6) AND THE DOCUMENTATION SUBMITTED. STEVE DID NOT DENY THE ACCURACY OF (b) (6) STATEMENTS ABOUT THE PUMP VOLUME, IN FACT HIS CONVERSATION WITH (b) (6) IN FEB. CONFIRMED THAT ONLY A SMALL AMOUNT OF WATER WAS AVAILABLE. IT WAS LATER REVEALED THAT SCOTT RALPH HAD RECORDED THE DATA AND THE SCREW-UP HAD NOT BEEN CAUGHT BY STEVE OR MEL WILSON.

CONCLUSION: I BELIEVE THAT THE OBVIOUS CONCLUSION OF MURPHY'S LAW HAS BEEN FULFILLED, THAT EVERYTHING THAT COULD GO WRONG DID GO WRONG. IN MY OPINION NO INTENTIONAL FRAUD OR RECORD DISTORTION WAS INTENDED. THE LACK OF PERSONAL SUPERVISION OF THE TRAINING BY MEL WILSON HAD A MAJOR IMPACT ON THE SAMPLING QUALITY DURING THE FALL OF 1989. WHEN THE VOLUME OF WATER IN A WELL WAS UNKNOWN, THE UNDERSTANDING OF THE SAMPLING PROTOCOL WAS FOR THE PURGING OF SUFFICIENT WATER TO CONFIRM THE FRESHNESS OF THE WATER BY USING THE CONDUCTIVITY METHOD OF STABILIZING THE SAMPLE READING PRIOR TO DRAWING OF A SAMPLE. IN THIS CASE, THIS CRITERIA WAS NOT MET AND THE SAMPLE WAS NOT IDENTIFIED AS NOT MEETING THE STANDARDS. I BELIEVE THAT I ALSO SHARE IN SOME OF THE RESPONSIBILITY FOR THIS PROBLEM. I COULD HAVE DONE A FIELD AUDIT OF THE WORK WHICH MAY HAVE CAUGHT THE PROBLEM EARLIER.

CORRECTIVE ACTION RECOMMENDED:

- 1.) MEL WILSON NEED TO PROVIDE US WITH A TRAINING AND SUPERVISION PLAN FOR FIELD SAMPLERS AND AN AUDIT PROTOCOL FOR PERIODIC REVIEW, TO ASSURE THE COMPLETENESS AND ACCURACY OF THE FIELD SHEETS.
- 2.) A FOCUSED EFFORT SHOULD BE UNDERTAKEN TO DETERMINE THE WELL WATER VOLUME AND PROVIDE A PURGE VOLUME FOR EACH WELL. MEL WILSON NEEDS TO HAVE HOSE BIBS INSTALLED AT POINTS IN THE INDIVIDUAL SYSTEMS PRIOR TO THE PRESSURE TANKS FOR

SAMPLING WHICH WOULD ASSURE THE THREE WELL VOLUME FLOW. THIS MAY BE EITHER A FROST FREE AT THE WELL HEAD WHERE PITLESS WELL EXIST OR A HOSE BIB IN THE WELL VAULT. THIS PROGRAM MUST INCLUDE THE INSTALLATION OF SWL COLLECTION POINTS WHERE USING OUR STANDARD METHODS RESULT IN PROBABLE LOSS OF OUR EQUIPMENT.

3.) THE FIELD SAMPLING SHEETS SHOULD BE MODIFIED TO ELIMINATE THE FIELD CALCULATION OF PURGE VOLUME AND CONFIRMATION OF THE CONTACT OF THE WELL OWNER ACCORDING TO THE OWNERS PREFERENCE.